

1 the computers for the submission of the bids to the FCC, if
2 you understand how they worked?

3 A Only vaguely. Several computers were loaded with
4 the software but mine was the primary one, which actually
5 never made sense to me, I couldn't understand why he was
6 delegating that duty to me and my computer. With my law
7 background, I know how serious that bidding duty was, and he
8 was basically putting it on my computer. I don't think his
9 computer actually had bidding software on it, I think mine
10 did, and the conference room computer did as a back-up, and
11 I think there was a lap-top as a second back-up that was
12 loaded with the bidding software, but not his personal
13 computer. The bidding software was loaded on the C: drive
14 rather than the network. And again, mine was the primary
15 computer that was set up for that.

16 Q Would it have been possible for -- okay -- let me
17 strike that. The software is on the C: drive and not the
18 network?

19 A Right.

20 Q So, if Mr. Easton prepared the bids in his office,
21 would there be any way to print those bids out or have those
22 bids come up on the screen of the computer in the conference
23 room?

24 A Yeah. The bidding software, the FCC software for
25 submitting the bid was on a local C: drive, but the

1 bidding -- I should clarify, the bidding software that we
2 used to prepare the bids was on the network. So, he could
3 prepare the bid in his office, save the file to the network,
4 and then I could download that file on my computer, or
5 upload is what I actually used.

6 Q I want to discuss the events now of January 23rd.

7 A Okay.

8 Q Can you recall what time you arrived at the office
9 that day?

10 A About 8:30.

11 Q And of course you mean pacific time?

12 A Pacific time, yeah.

13 Q Were you able to get into the office immediately
14 upon arrival?

15 A No.

16 Q Why not?

17 A We had a problem, an employee had recently --
18 well, not left the company because he never gave notice, we
19 just finally figured out that he wasn't coming back, and he
20 had keys to the office, so Terry had called in somebody to
21 change the locks. And I had been issued a new key, but it
22 was the wrong one, so it didn't work for the room I needed
23 to get into.

24 Q And this was the first day that the locks had been
25 changed?

1 A They had been changed, I think, two days in a row.
2 I don't recall if -- I think I had keys issued to me on both
3 of those times, and it was the second time that the key I
4 had didn't work.

5 Q What time were you finally able to get into the
6 office?

7 A It was close to 9:00 o'clock.

8 Q And who let you in?

9 A Terry.

10 Q Was that his usual time of arriving?

11 A No, he usually arrived earlier.

12 Q Was there a reason why he was late that day?

13 A If there was, he didn't tell me.

14 Q Now, you were the one who actually submitted the
15 bids to the Commission, correct?

16 A Yes.

17 Q What time of day was that done on the earlier
18 rounds?

19 A It varied; depending on their strategy. It was
20 often as late as this one was, because the way the bidding
21 works is if there was a tied bid, the person who bid it
22 first won, and if we were bidding minimum POPS, and didn't
23 necessarily want to win licenses, we wanted our bid to be
24 the latest one entered. So, we would often upload and leave
25 it sitting on there until Terry said, okay, anywhere between

1 9:30 and 9:45.

2 Q Is there a time it has to be submitted by?

3 A It had to be submitted by 10:00 o'clock Pacific
4 Standard Time. Our rule is that we try to never submit
5 later than 9:45, because that would give us time, if
6 something -- if the electricity failed or something at the
7 last minute, it would give us time to still call in manually
8 the bid.

9 Q When Mr. Easton arrived on that day, January 23rd
10 at 9:00 o'clock or around 9:00 o'clock, do you know if he
11 had already had the bids prepared the day before, or did he
12 still have to prepare the bids?

13 A He had to prepare the bids.

14 Q And how long of a process is that, how long did
15 that take him?

16 A Well, that day it took him about a half hour.
17 Normally the process started the day before, it's a long
18 process to do a good job evaluating. I mean if they just
19 wanted to do minimum bids and didn't want to do any
20 calculations, I suppose they could do it a lot faster, but I
21 wasn't as involved with that process.

22 Q Do you know if there was a reason why it wasn't
23 done the day before?

24 A I don't know.

25 Q Did he appear to be in any rush to get them done

1 that particular day?

2 A He was totally flustered, said he wanted no calls,
3 no interruptions.

4 Q And he said this prior to 9:30?

5 A Yeah.

6 Q And then did there come a time where he came to
7 you with the bidding sheet and told you to get this ready to
8 uplink to the Commission?

9 A I don't remember the exact order, sometimes he
10 would come out and say the file is ready to upload, and I
11 would say do a printout and sign it. I might upload it
12 while he was doing that, but I wouldn't go any farther than
13 that. So, I don't know whether he came out with the sheets
14 first, or if I told him to bring the sheets.

15 Q Okay. But, there did come a time when you
16 actually got a sheet that he had signed, he put his time and
17 date on?

18 A Right.

19 Q Were those the ones actually submitted to the
20 Commission?

21 A No.

22 Q Why not?

23 A Let me clarify -- were those the documents or the
24 actual bids?

25 Q The bids, were those bids the ones actually

1 uploaded to the Commission?

2 A No.

3 Q And why not?

4 A Once we had them on the screen, Terry told us to
5 hold off on the bid for a while, he went back to his office,
6 I think. He came back and said he wanted to remove four
7 bids that had low POPS, because we were over the minimum and
8 we needed to maintain eligibility. And so I deleted four
9 markets. That brought us below eligibility so I added one
10 back in, and that brought us just above our minimum POPS.

11 Q Now, when you withdrew the four markets, did he
12 prepare another bidding sheet at that time?

13 A Yes.

14 Q And then when you added one back in, he prepared
15 yet a third one?

16 A Oh, I'm sorry, no. He only prepared two sets that
17 day. After I deleted the four, he didn't prepare any new
18 sheets until I put the one back in. So, the new sheets
19 would reflect three deleted markets.

20 Q Can you recall the markets that were deleted at
21 this time?

22 A No, I can't.

23 Q Do you recall if Sacramento was one of the markets
24 that was deleted?

25 A I wouldn't remember.

1 Q What was done with the first bidding sheet that he
2 had signed, dated?

3 A We argued over them. I wanted to put them in my
4 binder. He refused and threw them in the garbage can.

5 Q Now, why did you want them in the binder if they
6 were not the ones to be submitted to the Commission?

7 A I wanted a record of everything that he had
8 signed. I often kept a record of things that did not happen
9 as well as things that did happen. I kept, for instance, a
10 database on his magazine subscriptions, and I would keep a
11 record of when the subscription ended, just to know that it
12 had ended, so I would have a record of that. It's just kind
13 of one of my habits to keep records.

14 Q Now, I realize this was only round eleven, was
15 this the first time that there were multiple bidding sheets
16 prepared before the bids were actually uploaded to the
17 Commission, that you can recall, or did it happen before?

18 A I don't remember.

19 Q Do you recall ever having a time where you had two
20 different bidding sheets for the same day, for the same
21 bidding round put into your binders?

22 A I don't recall.

23 Q Now, what was your job once you got the bidding
24 sheet to do with it, you know, he signs the bidding sheet,
25 puts the date on it, puts the time on it, brings it to you,

1 what was your responsibility from that point?

2 A From that point I would find the file that matched
3 the name on the reports, I would download that file from the
4 server into the FCC software, so that the screen would
5 reflect the bids that were listed. Then I would compare the
6 bids on the screen with the bids on the report.

7 Q And your comparison was done how, would you look
8 market by market to be sure each number was the same and all
9 the markets were the same?

10 A Pretty much, yeah. They were -- we would sort
11 them, make sure that the sheets were sorted the same way you
12 can sort the FCC software, by POPS, descending or ascending,
13 so I'd have them sorted the same way and I would go line by
14 line, with one finger on the screen and one finger on the
15 sheet, and compare each number.

16 Q And can you recall was that process done on
17 January 23rd?

18 A I'm not sure. I think there was a partial
19 comparison but the time limitations didn't allow me to do
20 much. Actually, I need to clarify. There is a sum at the
21 bottom of page two of what's called the Control P document,
22 and what I always did was compare the bid units, the new
23 bids dollar amount and the total number of bids, and new
24 bids.

25 Q To make sure the two of them had the same numbers?

1 A To make sure that everything compared on that,
2 yes. If I had time, I would do the line by line and I don't
3 believe I had time that morning to do a line by line
4 comparison.

5 Q And again, that's because everybody, or because
6 there was a rush and the thing started late?

7 A Uh-hum, yes, I'm sorry. But, the ironic thing is
8 that even had I done that, I wouldn't have caught the error,
9 because all it did was tell me that what was on my piece of
10 paper was on the screen.

11 Q That's understood. Now, for the earlier ten
12 rounds, was Mr. Breen also in the office?

13 A I think he was in the office for the first few,
14 but after he was sure that things were running smoothly, I
15 think he went back to Oregon. That was probably even before
16 Christmas, before Christmas break.

17 Q Do you know whether Mr. Easton called Mr. Breen
18 prior to 9:30 in the morning to discuss the bids?

19 A No, I don't know. Quentin was in his car, Terry
20 would have had to call him on the car phone, which he could
21 have done, I don't know.

22 Q Did Mr. Easton, in the earlier rounds -- actually,
23 let's ask it a different way. Was Mr. Easton, up until
24 round eleven, the primary person responsible for submission
25 of the bids or preparing of the bids?

1 A Pretty much, though I seem to recall there was one
2 time when Quentin prepared the bids, and I had him sign them
3 via fax.

4 Q On the rounds other than the one where maybe Mr.
5 Breen prepared, did Mr. Easton typically confer with Mr.
6 Breen regarding his preparation of the bids?

7 A I don't know. His office was pretty far away from
8 where I sat.

9 Q And which "his" do you mean, Mr. Breen or Mr.
10 Easton?

11 A I'm sorry, Mr. Easton's office was far enough away
12 from where I sat that I wouldn't have heard him on the phone
13 and those conversations would have been done in his office.

14 Q I guess is the same true, whether or not he
15 conferred
16 -- whether Mr. Easton conferred with Mr. Lamoso in preparing
17 the bids?

18 A As far as I know, Javier wasn't involved in bid
19 preparation at all.

20 Q Did there come a time where it was learned there
21 was a mistaken bid placed in round eleven on January 23rd?

22 A Oh yes.

23 Q And how was that discovered?

24 A I was printing flash reports after withdrawal, I
25 was in Bill Pezzhaglia's office working on the Unix

1 computer, and I was in there I think with Lorri and Mike
2 Gavette, and Ronit came in and started looking at some of
3 the reports, and she's the one that noticed the over-bid.

4 Q And what did she say, if you can recall?

5 A She gasped very loudly and said something like, oh
6 my God, and read out the bid. And she and I went back to my
7 desk to pull my binder to verify that that's what my binder
8 said that we bid.

9 Q And did it?

10 A Yes.

11 Q And then what occurred?

12 A I believe she went to tell Terry about it, and I
13 stayed at my desk. And they both came back to my desk to
14 look at the binder again.

15 Q And then what did Mr. Easton do?

16 A He immediately accused me of screwing up. He said
17 something to the effect of how could you let this get by
18 you. And then the second thing he said was get the FCC on
19 the phone.

20 Q And are you the one who dialed the FCC number?

21 A Yes, I am. And I listened to the part about the
22 phone call being recorded, and then I handed the phone to
23 him.

24 Q Do you know if more than one call was placed that
25 day?

1 A I don't know. I know he spoke to two people, it
2 was a woman who answered the phone, that I listened to say
3 it's a recorded line, I heard Terry talk to her, and then a
4 little later I heard Terry talking to Louis Segalos, or
5 whatever his last name is. I don't know if Terry was
6 transferred to him or if he was given a number, hung up and
7 called back, but that conversation was all at my desk.

8 Q Do you know what time of day this was that the
9 phone call occurred?

10 A I think it was around -- it was either 11:15 or
11 12:15, I don't remember exactly. It was basically about 15
12 or 20 minutes after final bids were posted, final results
13 after withdrawal period.

14 Q Was the phone call -- did -- where was the phone
15 call placed, where was Terry when he was speaking on the
16 phone?

17 A He was at my desk.

18 Q And can you recall what -- strike that. How long
19 was the conversation between the two people that he spoke
20 to?

21 A I don't know. And it's ironic that you ask that
22 because what I have since found is that whole time frame
23 between the time that I first called the FCC and the time I
24 first called Javier, back then seemed like months, so time
25 really stretched out, unless I had a time frame as to, you

1 know, like I know when the call started because it was a
2 certain number of minutes after we had done the bids. My
3 time estimation is not good.

4 Q Now, you did say you know that he spoke to two
5 different people. How do you know that?

6 A Well, the person that -- unless the person who
7 told me it was a recorded line handed the phone to somebody
8 else, the same as I did, before Terry talked to that person,
9 I know he spoke to a woman. I know he spoke to Louis
10 because I recall the name and I've also seen the transcript
11 of that conversation.

12 Q What, to the best of your recollection, can you
13 recall him saying on the phone to the FCC?

14 A The first person he talked to he was yelling at
15 her saying it was the FCC's fault, that our computers did
16 not make the error, that somehow the FCC's computer made the
17 error, basically kept going on on that point.

18 Q Was anybody else in the vicinity while he was on
19 this phone call?

20 A Ronit was for part of it, she left after he
21 started saying the bit about the FCC computer being at
22 fault. That's Ronit Milstein, you've got her name.

23 Q She was there at least at the part where he was
24 yelling?

25 A Yes.

1 Q Can you recall if anybody else was there?

2 A I don't think so.

3 Q What happened after he concluded his call with the
4 FCC?

5 A He went back to his office. I'm not sure what I
6 did next but I was away from my desk for a while. I came
7 back to my desk to look for my binder so I could make a copy
8 of the signed papers, because I was a little concerned, and
9 my binder was gone. I had told people on several occasions
10 that I never wanted the binder to leave my desk. If anybody
11 wanted to look at something for an extended period of time,
12 I would make copies, but I did not want it to leave. And
13 actually I never saw that binder after that.

14 A little after that one of our temps, Scott
15 Merberger, was faxing something that Terry had handed him.
16 Terry had been on his computer during this time. And I
17 picked up the papers that Scott was faxing and noticed that
18 the 180 million dollar bid had been changed and now
19 reflected the 18 million, one-less zero.

20 Q And what time of day was this?

21 A Again, it seemed like late afternoon, but I think
22 I went to lunch at one, so it was probably a bit before
23 that.

24 Q Did you ask Scott, or the temp, about this, about
25 what he was doing?

1 A Yeah. I said, where are you sending that? And he
2 said, Terry asked me to send it to the FCC.

3 Q Do you know if a copy was also sent to Mike
4 Sullivan?

5 A I don't know.

6 Q Do you know who Mike Sullivan is?

7 A One of Terry's many attorneys, I don't know which
8 faction, whether it's SEC or FCC that Mike represents.

9 Q Did you say anything to the temp about the
10 documents he was sending?

11 A Uh-hum.

12 Q Yes?

13 A Yes. I'm sorry. I told him that Terry was
14 cooking the books.

15 Q And what did the temp say about that?

16 A He shrugged, nothing new.

17 Q Do you know what temp agency this temp worked for?

18 A He also came out of Alpha IV.

19 Q And is Four spelled out or is it the number?

20 A I think it's Roman Numeral.

21 Q Roman Numeral. Did there come a time where you
22 went to speak to Ms. Milstein about what you saw Mr. Easton
23 doing?

24 A Yes.

25 Q Do you recall when that was?

1 A No, I don't know if it was before or after lunch.

2 Q But, you spoke to her on the 23rd?

3 A Yes.

4 Q What did you tell Ms. Milstein?

5 A I told her that he took my binder with the signed
6 papers in it, and that he was sending papers to the FCC that
7 had changed the numbers on the bid.

8 Q At this point did you know for a fact he took the
9 binder, or was that speculation?

10 A Speculation, but I had checked and nobody else had
11 it.

12 Q Did you remind her that she had seen the bidding
13 sheet in your binder with the 180 million dollar bid at the
14 initial point where the over-bid was discovered?

15 A No, there wasn't any need to remind her.

16 Q What was her reaction to your giving her the
17 information about Mr. Easton?

18 A She said several things, one is I was angry that -
19 - I didn't just say those things, I said I was angry that he
20 had accused me of making the mistake, and she was trying to
21 soothe me and say, well, you know, nobody is blaming you,
22 you're not going to get fired. I'm not sure she actually
23 made any comments about what Terry was doing, that wouldn't
24 be in her nature.

25 Q Did you express to her any type of concern that

1 somehow you might have made a mistake and you wanted to be
2 sure you did not?

3 A No, I know I didn't have any key strokes that had
4 anything to do with Norfolk, Virginia.

5 Q Did you discuss with her that you checked the
6 numbers against the bidding sheet?

7 A No.

8 Q Did you at any point in that day, after Mr.
9 Easton's phone call to the FCC, have further discussions
10 with Mr. Easton?

11 A Just one. He was walking over to the fax machine,
12 which is near my desk, and he was shaking his head and
13 saying, last week they screwed up with the upload, upload
14 and now they're screwing up with our bid.

15 Q Was anybody else in the vicinity when he said
16 that?

17 A I don't remember.

18 Q Did you have any response?

19 A Yeah. I told him, yeah, but this time they didn't
20 screw up, we did.

21 Q And what did he say?

22 A Nothing.

23 Q Did the discussion he had with you -- when he was
24 saying to you that you might have messed up when the bid was
25 first discovered, can you recall specifically what his words

1 were?

2 A I think the words were, "How did you let this get
3 by you", or "How could you let this get by you".

4 Q Did he ever accuse you of actually entering the
5 excessive bid?

6 A No. That was the only comment he made.

7 Q From your computer, would you have been able to
8 change one of his bids, had you wanted to?

9 A Yes.

10 Q Was there a point during that day that you called
11 the FCC yourself to speak to somebody at the FCC?

12 A I called them from home, not from work, but yes,
13 on that day.

14 Q And what time of day was that then?

15 A It was a little after 1:00 o'clock Pacific
16 Standard Time.

17 Q Did you leave the office then for the day, by that
18 point after lunch, or did you go home for lunch?

19 A I went home for lunch.

20 Q And then you did return to the office after
21 talking to the FCC yourself?

22 A Yes.

23 Q And can you recall who you spoke to at the FCC?

24 A I spoke to several people, I don't remember all of
25 the names until I reached Gordon Coffman.

1 Q Well, I know how the government runaround goes
2 when --

3 A Well, nobody knew what to do with me because I
4 wasn't going to tell my story just to anybody, because I
5 didn't want it to get back to Terry. So, I was pretty
6 cryptic and said I wanted to talk to somebody in the legal
7 counsel office about possible fraud, and they thought I
8 meant fraud involving investors and SEC violations, so they
9 didn't know quite what to do with my call.

10 Q And is that how you got to Mr. Coffman?

11 A Yes.

12 Q I do know he is one of the fraud experts in
13 terms --

14 A Right, that's how I got to him and --

15 Q Was the number you dialed one of the auction
16 numbers initially?

17 A I think I called the number we had for the
18 attorneys, I don't know if it was the Office of Regional
19 Counsel or if they had special attorney lines set up for the
20 auction, I don't recall.

21 Q And what did you tell Mr. Coffman?

22 A I told Mr. Coffman what I saw happen and that I
23 had taken documents from the office showing Terry's
24 signature that included the 180 million dollar bid.

25 Q Actually there I think I missed a point. You said

1 you took documents, you said your binder was missing,
2 correct?

3 A Yes.

4 Q Where did you find documents then?

5 A I took them out of my trash can, where Terry had
6 put them earlier in the day.

7 Q So, the documents you had were the initial ones
8 prior to the removing of the four markets and the re-
9 entering of the one market?

10 A Yes.

11 Q And the document which shows the bids submitted,
12 that had the removal of the four and the resubmission of the
13 one, have never been seen, is that correct?

14 A I've never seen them and I have been told nobody
15 else has either.

16 Q Do you know how the documents -- how bid
17 submissions were stored on the drives or on files, if they
18 were put into any type of archive where they would be kept?

19 A I believe they were put in an archive where they
20 would be kept, but at this point I can't tell you whether
21 that's firsthand knowledge or because I've read it.

22 Q Okay. Let's go back to your discussion with Mr.
23 Coffman then. What was -- what did he tell you, after you
24 told him this story?

25 A He said that after hearing the story he wasn't the

1 appropriate person to be talking to, and that he wanted to
2 run it by some other attorneys and call back the next
3 morning to discuss it further.

4 Q Now, I know we've had this problem before but, do
5 you recall how long of a telephone call that was?

6 A No. I have the phone records at home.

7 Q Did you have further contact with the FCC then,
8 within the next few days?

9 A Yes, Gordon Coffman and Bill Kennard called me the
10 next morning and I spent a good deal of time, maybe an hour
11 or more, I don't know, on the phone with them, retelling the
12 story.

13 Q What did they have to say?

14 A They were pretty concerned. They definitely
15 wanted to see the documents. I told them that I was also
16 writing up a declaration at the same time, because I wanted
17 to clearly remember what happened, and they asked me to fax
18 a copy of that as well.

19 Q And it was your own suggestion to create the
20 declaration?

21 A Yes.

22 Q At this point you told them that you had the
23 original documents, or the documents that were sent to the
24 Commission, or the original bidding sheets, right?

25 A Right.

1 Q Did they know that Mr. Easton had sent, by fax,
2 other bidding sheets to the Commission?

3 A I told them that he had. I don't know if they
4 told me that they had received them. At some point they
5 mentioned something about my papers and his papers not
6 showing the same numbers, but I don't know if it was that
7 conversation or the next couple of days.

8 Q There were additional conversations beyond this
9 one that you had with Mr. Coffman and Mr. Kennard?

10 A Yes. Actually, not with Mr. Coffman, he bowed out
11 after that, and just with Bill Kennard.

12 Q And how many more would you say you had with him?

13 A I really couldn't say.

14 Q More than two?

15 A Oh, definitely more than two, it could have been
16 two a day, I just don't remember.

17 Q Did they ever have any instructions for you to
18 take any additional actions or anything, did Bill Kennard?

19 A I don't believe so. I gave notice at San Mateo
20 Group on the 24th in the morning, so I never went back
21 there.

22 Q How did you give notice to San Mateo Group?

23 A I faxed it at the same time I faxed the papers to
24 the FCC.

25 Q Did you address the resignation to any particular

1 person?

2 A I don't recall offhand. I can look it up if you'd
3 like.

4 Q Actually, that may be a little bit unfair. I will
5 show you later, when we get to the documents, we do have a
6 copy of your resignation, and the resignation itself is
7 addressed, "To Whom It May Concern". Did you have a cover
8 sheet, a fax cover sheet with the transmission, do you
9 recall?

10 A Yes, I did.

11 Q And do you recall if you had that addressed to any
12 particular person?

13 A I don't recall.

14 Q Did you ever speak to anybody at San Mateo Group
15 about resigning?

16 A Oh yes. Well, after I did.

17 Q And at what point?

18 A Some time that day Lorri called me --

19 Q And "that day" is January 24th?

20 A January 24th. Let me preface that, I had talked
21 to somebody who was a consultant with San Mateo Group the
22 night that this event happened.

23 Q And who was that?

24 A That was Fred Gross, he was a computer consultant,
25 and I told him I was going to quit the next morning.

1 Q And did you tell him why?

2 A Yes.

3 Q And what did he say?

4 A He -- actually the first thing he said is, I'm
5 glad you did, because if you didn't turn him in, I would
6 have.

7 Q Do you know how his last name is spelled?

8 A G-r-o-s-s.

9 Q And do you know -- you said he was a consultant?

10 A Yes.

11 Q And he was one of the computer consultants?

12 A Yes.

13 Q Do you know who he worked for?

14 A I think it's called Action Computers,
15 Incorporated, or just Action Inc., I'm not sure which one.
16 They're located on Ralston and Belmont.

17 Q Did he work with Mr. Gavette?

18 A They worked together at San Mateo Group but they
19 were not employed by the same company.

20 Q Do you know what he meant by, if you didn't turn
21 him in, I would have turned him in?

22 A We discussed the whole event and it was because
23 Terry had changed the bids and faxed them to the FCC. I had
24 discussed that with him, on the 23rd I had discussed it at
25 least with everybody in the office -- well, not everybody --

1 with Mike Gavette, with Ronit, with Lorri Collins and with
2 Fred, and Scott Merberger.

3 Q You discussed that Mr. Easton was changing the bid
4 with all those people?

5 A Yes.

6 Q Let's kind of take them sort of one by one. By
7 Lorri, you mean Lorri Collins?

8 A Yes.

9 Q And what did she have to say about that?

10 A She wasn't surprised at all. I don't know what
11 she said specifically but she and I had both seen Terry
12 cheat people on several occasions at least, pretty much
13 chalked it up to an expression you have probably heard
14 before as, Terry being Terry.

15 Q What was your working relationship like with Ms.
16 Collins?

17 A It was up and down, we got along most of the time,
18 but I started out as administrative assistant, answering
19 phones, doing a lot of the work that she did, once the
20 bidding started I was pulled off the phones and off of those
21 kinds of duties and put strictly on bidding activities, and
22 she never said anything to me about it, but we had set up a
23 procedure where if somebody needed something done, like
24 faxing, typing, copying, filing, that it would be written on
25 a clipboard and that Lorri would assign it to one of the